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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

S.L., a minor by and through the
Guardian Ad Litem Kristine Llamas
Leyva, individually and as successor-in-
interest to JOHNNY RAY LLAMAS,
deceased; V.L., by and through the
Guardian Ad Litem Amber Snetsinger,
individually and as successor-in-interest
to JOHNNY RAY LLAMAS, deceased;
and CAROLYN CAMPBELL,
individually,

Plaintiffs,

v.

COUNTY OF RIVERSIDE; SHAWN
HUBACHEK; JIMMIE MCGUIRE; and
DOES 3-10, inclusive,

Defendants.

Case No. 5:24-cv-00249-CAS-SP

Honorable Christina A. Snyder

**DECLARATION OF BENJAMIN S.
LEVINE IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

*[Filed concurrently with Plaintiffs'
Memorandum of Points and Authorities
in Opposition to Defendants' Motion for
Summary Judgment; Plaintiffs'
Separate Statement of Facts; Plaintiffs'
Objections to Evidence; Declaration of
Roger Clark]*

Date: June 23, 2025

Time: 10:00 a.m.

Courtroom: 8D

DECLARATION OF BENJAMIN S. LEVINE

I, Benjamin S. Levine, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California, and the Central District of California. I make this declaration in support of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment. I have personal knowledge of the facts contained herein and could testify competently thereto if called.

2. Attached hereto as "**Exhibit 1**" is a true and correct copy of the relevant portions of the transcript of the December 20, 2024, Deposition of Jimmie McGuire.

3. Filed concurrently herewith, together with a request to file document under seal, as "**Exhibit 2**" is a true and correct copy of the relevant portions of the transcript of the April 16, 2023, Interview of Jimmie McGuire, conducted as part of the Riverside County Sheriff's Department Force Investigations Detail investigation of the subject incident. This transcript was produced to Plaintiffs by Defendants during discovery in this action.

4. Attached hereto as "**Exhibit 3**" is a true and correct copy of the relevant portions of the transcript of the December 18, 2024, Deposition of Shawn Hubachek.

5. Attached hereto as "**Exhibit 4**" is a true and correct copy of the relevant portions of the transcript of the March 21, 2025, Deposition of Michael Walsh, as well as the photograph exhibit to that deposition.

6. Attached hereto as "**Exhibit 5**" is a true and correct copy of the relevant portions of the transcript of the October 24, 2024, Deposition of Amber Snetsinger.

7. Attached hereto as "**Exhibit 6**" is a true and correct copy of the relevant portions of the transcript of the October 24, 2024, Deposition of V.L.

8. Attached hereto as "**Exhibit 7**" is a true and correct copy of the relevant portions of the transcript of the October 23, 2024, Deposition of Kristine Llamas Leyva, which has been partially redacted to obscure Plaintiff S.L.'s first name.

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1 9. Attached hereto as “**Exhibit 8**” is a true and correct copy of the relevant
2 portions of the transcript of the October 23, 2024, Deposition of S.L.

3 10. Attached hereto as “**Exhibit 9**” is a true and correct copy of the relevant
4 portions of the transcript of the October 23, 2024, Deposition of Carolyn Campbell.

5 11. Attached hereto as “**Exhibit 10**” is a true and correct copy of the relevant
6 portions of the Riverside County Coroner Autopsy Report.

7 12. Attached hereto as “**Exhibit 11**” are true and correct copies of
8 photographs depicting the incident location, one of which has been partially redacted
9 for the privacy of decedent Johnny Ray Llamas and Plaintiffs.

10 13. Attached hereto as “**Exhibit 12**” is a true and correct copy of a Notice of
11 Intent to Close Child Support Case received by Plaintiff V.L.’s mother and Guardian
12 *ad Litem*, Amber Snetsinger.

13 14. Attached hereto as “**Exhibit 13**” are true and correct copies of
14 screenshots of electronic messages exchanged between Plaintiff V.L. and decedent
15 Johnny Ray Llamas, who appears under the nickname “Memphis,” which have been
16 partially redacted to obscure Plaintiff V.L.’s first name.

17 15. Attached hereto as “**Exhibit 14**” is a true and correct copy of a zoomed-
18 in clip of a video recording of the incident captured from a helicopter via infrared
19 camera, which was designated as Defendants’ Exhibit 1, depicting the immediate
20 leadup to the first volley of shots and the first volley.

21 16. Attached hereto as “**Exhibit 15**” is a true and correct copy of a zoomed-
22 in clip of a video recording of the incident captured by Defendant Shawn Hubachek’s
23 body-worn camera, which was designated as Defendants’ Exhibit 6, depicting the
24 immediate leadup to the first volley of shots and the first volley.

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1 I declare under penalty of perjury of the laws of the United States of
2 America, that the foregoing is true and correct. Executed on June 2, 2025, at
3 Woodland Hills, California.

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5 /s/ Benjamin S. Levine

6 Benjamin S. Levine
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